



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

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VIA ECF

Hon. Valerie E. Caproni
United States District Judge
United States District Court
40 Foley Square
New York, New York 10007

MEMO ENDORSED

Re: *Jiang v. Mayorkas, et al.*, No. 22 Civ. 6192 (VEC)

Dear Judge Caproni:

This Office represents the government in this action in which the plaintiff seeks an order compelling U.S. Citizenship and Immigration Services (“USCIS”) to adjudicate three Refugee/Asylee Relative Petitions (Forms I-730). On behalf of the government, I write respectfully to request a sixty-day extension of the time to respond to the complaint (*i.e.*, from October 3, 2022, to December 2, 2022). In addition, I respectfully request that the initial pretrial conference presently scheduled for October 7, 2022 be rescheduled to the week of December 12, 2022 or thereafter (with a corresponding extension of time for the preconference submission).

I respectfully request this extension because USCIS issued Requests for Evidence relating to two of the Forms I-730 and needs additional time to determine next steps and other adjudicative action with respect to these forms which could render a portion of the complaint moot. In addition, USCIS is still reviewing the remaining Form I-730 that is pending overseas and needs additional time to consider next steps with respect to that form, which may also include a Request for Evidence, Notice of Intent to Deny, or other adjudicative action. This is the government’s first request for an extension of the deadline to respond to the complaint and an adjournment of the initial conference. Plaintiff consents to these requests.

I thank the Court for its consideration of this letter.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

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cc: Counsel of record (via ECF)

Application GRANTED. The initial pretrial conference is rescheduled for **Friday, December 16, 2022, at 10:00 A.M.** in Courtroom 443 of the Thurgood Marshall Courthouse, 40 Foley Square, New York, New York, 10007. The parties' pre-conference submissions, as described at Dkt. 5, are due no later than **December 8, 2022.**

SO ORDERED.



09/29/2022

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE